

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 18-MJ-03427-BPB
)	
v.)	
)	
ANDREW TRE BETTELYOUN,)	
)	
Defendant.)	


**SECOND WAIVER OF TIME FOR GRAND JURY PRESENTMENT
AND REQUEST FOR ORDER TOLLING SPEEDY TRIAL TIME COMPUTATION**

1. I am the defendant in this criminal proceeding.
2. I understand that I have a right to have my case presented to the grand jury within 30 days of my arrest pursuant to 18 U.S.C. § 3161(b).
3. On December 12, 2018, I waived grand jury presentment for an additional 60 days and requested the Court exclude a total 90 days from calculation of speedy indictment. (Doc. 9). The Court granted this request. (Doc. 10).
4. I hereby request a continuance of grand jury presentment for an additional period not to exceed 30 days for a total of 120 days from the date of my arrest. By that, I mean that I request a total period of 120 days be excluded from the calculation of the speedy indictment provision of 18 U.S.C. § 3161(b). I further request that the Court, without objection from the United States, enter an order providing that the above-referenced time period be excluded from speedy indictment computation, pursuant to 18 U.S.C. § 3161(h)(7)(A).

5. If I cannot reach an agreement with the United States Attorney's Office, I understand that my case will be presented to a grand jury at a later date, consistent with this waiver.


ANDREW TRE BETTELYON
Defendant

I have reviewed the foregoing document with my client and represent to the Court that he understands it. I further represent to the Court that I believe it is in my client's best interest to agree to the contents of this document.


HAKOP J. MKHITARIAN
Defense Counsel
Date: 1/18/19